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Attorneys for the Ad Hoc Group
of Lehman Brothers Creditors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., et al.,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
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**VERIFIED STATEMENT OF THE AD HOC GROUP OF LEHMAN BROTHERS
CREDITORS PURSUANT TO BANKRUPTCY RULE 2019**

Gerard Uzzi, verifies as follows:

1. I am a member of the law firm of White & Case LLP ("White & Case"). I am admitted to practice in the States of New York, New Jersey and Florida, as well as in the United States District Courts for the Southern and Eastern Districts of New York, the District of New Jersey and the District of Colorado. I am authorized to make this statement (the "Statement") on behalf of the Ad Hoc Group of Lehman Brothers Creditors (the "Group").
2. On April 18, 2011, the Court entered an order [Docket No. 16107], directing the Group to strictly with the requirements of Rule 2019. This Statement is submitted as good faith compliance with the Court's direction.
3. The Group was formed in or around May 2009 by Elliott Management Corporation, King Street Capital Management, L.P., and Paulson & Co. Inc. for the purpose of participating in the above-reference chapter 11 cases of Lehman Brothers Holdings Inc.

(“LBHI”) and its affiliated debtors (collectively, the “Debtors”) and sharing costs with respect thereto.¹ In connection therewith, the Group retained White & Case as counsel. As well, in or around April 2010, the Group engaged AlixPartners, LLP, as financial advisor.

4. As of the date hereof, the Group is comprised of the entities whose names and addresses are set forth on Annex A, attached hereto (each, together with its affiliates, a “Group Member”). The Group is empowered to act pursuant to that certain Second Amended and Restated Agreement of the Ad Hoc Group of Lehman Brothers Creditors, the form of which is attached hereto as Annex B (the “Formation Agreement”). The Steering Committee (as defined in the Formation Agreement) is, as of the date hereof, comprised of Canyon Capital Advisors LLC, Fir Tree, Inc., Paulson & Co. Inc. and Taconic Capital Advisors L.P. The Formation Agreement provides that certain signatories thereto are Fee Participants and certain others are Institutional Holders (each as defined in the Formation Agreement). Whether a signatory is a Fee Participant or an Institutional Holder is set forth in Annex A.

5. Schedules attached hereto as Annex C contain, with respect to each Group Member, the following categories of information, which the Group in good faith believes meet, at least at a minimum, the disclosure requirements set forth in Rule 2019:

- the amount of claims against and interests in the Debtors and certain of their material affiliates that were held by each Group Member on April 13, 2011, unless otherwise indicated;²
- the time of acquisition of each such claim or interest;
- the nature of such claims and interests; and

¹ Elliott Management Corporation and King Street Capital Management, L.P., have since withdrawn from the Group.

² For the purpose of making this Statement, the “material affiliates” are Lehman Brothers Inc., Lehman Brothers Bankhaus AG (in Insolvenz), Lehman Brothers International (Europe), Lehman Brothers Treasury Co. B.V., and Lehman Brothers Finance AG.

- as of the formation of the Group (or as of the date each Group Member joined the Group), the amounts of claims or interests owned by each Group Member, the times when acquired, the amounts paid therefore, and any sales or other disposition thereof.³

6. In connection with preparing this Statement, the Group has made certain assumptions or has otherwise followed certain guidelines. These include the following items:

- the claims listed in Annex C include those claims for which a Group Member holds the beneficial ownership of such claim, or otherwise has investment authority, contractual authority or voting authority with respect to such claim;
- where a claim would otherwise be denominated in a foreign currency, such claim has been converted to U.S. Dollars using the exchange rate as of September 15, 2008;⁴
- for claims based on notes, the original face amount of the notes has been listed without regard to any accrued interest;
- for claims based on a derivative contract, the amount as stipulated with the Debtors is listed if such claims have in fact been stipulated, otherwise the amount as set forth on the applicable proof of claim is listed;
- where a guarantee claim was acquired with the underlying primary claim and no separate allocation was made with respect to the purchase price, the aggregate purchase price is listed with the underlying primary claim and “UDT” or “undetermined” is listed with the associated guarantee claim; and
- where a claim based on a derivative contract is the result of a prepetition derivative contract between a Group Member and the Debtors or one of their affiliates, the termination date is listed as the time “acquired.”

7. The provision of the information contained in this Statement is not intended and should not be construed to be (i) a waiver or release of any claims against or interests in the Debtors of their affiliates held by any of the Group Members, their affiliates or any other entity,

³ Only summary information is provided with respect to Pacific Investment Management Company LLC, which is still in the process of gathering the foregoing information. Once complete, a supplemental statement will be submitted as soon as practicable. The foregoing detailed information is provided with respect to all other Group Members.

⁴ In particular, the Group has used the following exchange rates for the purpose of preparing this Statement: (1) 0.009555 USD per JPY; (2) 1.4243 USD per EUR; (3) 1.8007 USD per GBP; (4) 0.9424 USD per CAD; (5) 0.8917 USD per CHF; (6) .1282 USD per HKD; and (7) 0.8066 USD per AUD.

(ii) an admission with respect to any fact or legal theory, or (iii) an amendment to or restatement of any proof of claim filed against the Debtors or any of their affiliates.

8. I verify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. The source of my knowledge with respect to the information contained herein and in Annex A and Annex B is a review of certain documents by myself or persons acting at my direction and my general knowledge of this matter. The source of my knowledge with respect to the information contained in Annex C is communications with each Group Member by myself or persons acting at my direction.

Dated: April 22, 2011
New York, New York

Respectfully submitted,

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By: /s/ Gerard Uzzi
Gerard Uzzi

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